

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:25-cv-22896-JEM

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida,

Defendants,

and

The Miccosukee Tribe of Indians,

Proposed Intervenors.

PLAINTIFFS' MOTION FOR LEAVE TO FILE VIDEO CLIP CONVENTIONALLY

Plaintiffs, through undersigned counsel, hereby file a Motion for Leave to File a Video Clip Conventionally on a USB thumb drive, and state:

1. On July 18, 2025, Plaintiffs filed with the Court a notice of filing the declaration of Jessica Namath, which seeks to attach as Exhibit A a video taken by Ms. Namath.

2. In order to file the video clip, which cannot be e-filed, conventional filing is required.

WHEREFORE, Plaintiffs respectfully request leave to file Exhibit A to the declaration of Jessica Namath conventionally.

Dated: July 18, 2025.

Respectfully submitted,

EARTHJUSTICE
4500 Biscayne Boulevard, Suite 201
Miami, Florida 33137
Telephone: (305) 440-5432

COFFEY BURLINGTON, P.L.
2601 South Bayshore Drive, Penthouse One
Miami, Florida 33133
Telephone: (305) 858-2900

By: s/ Tania Galloni
Tania Galloni, Fla. Bar No. 619221
tgalloni@earthjustice.org
Dominique Burkhardt, Fla. Bar No. 100309
dburkhardt@earthjustice.org
Alisa Coe, Fla. Bar No. 10187
acoe@earthjustice.org

Counsel for Friends of the Everglades

By: s/ Paul J. Schwiep
Paul J. Schwiep, Fla. Bar No. 823244
PSchwiep@CoffeyBurlington.com
Scott Hiaasen, Fla. Bar No. 103318
SHiaasen@CoffeyBurlington.com
YVB@CoffeyBurlington.com
LPerez@CoffeyBurlington.com
service@CoffeyBurlington.com

Counsel for Plaintiffs

CENTER FOR BIOLOGICAL DIVERSITY
Elise Pautler Bennett, Fla. Bar No. 106573
ebennett@biologicaldiversity.org
Jason Alexander Totoiu, Fla. Bar No. 871931
jtotoiu@biologicaldiversity.org
Post Office Box 2155
St. Petersburg, FL 33731
Telephone: (727) 755-6950

Counsel for Center for Biological Diversity

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 18, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the Service List below via transmission of Notice of Electronic Filing generated by CM/ECF.

s/ Paul J. Schwiep

Service List	
Nathan A. Forrester Chief Deputy Solicitor General nathan.forrester@myfloridalegal.com Robert S. Schenck Assistant Solicitor General robert.schenck@myfloridalegal.com Office of the Attorney General The Capitol, PL-01 Tallahassee, Florida 32399-1050 Telephone: (850) 414-3300 jenna.hodges@myfloridalegal.com <i>Counsel for Defendant Kevin Guthrie, in his official capacity as Executive Director of the Florida Division of Emergency Management</i>	BOIES SCHILLER FLEXNER LLP Jesse Panuccio, Esq. jpanuccio@bsflp.com Evan Ezray, Esq. eezray@bsflp.com 401 East Las Olas Boulevard, Suite 1200 Fort Lauderdale, Florida 33301 Telephone: (954) 356-0011 <i>Counsel for Defendant Kevin Guthrie, in his official capacity as Executive Director of the Florida Division of Emergency Management</i>
GERALDINE BONZON-KEENAN Miami-Dade County Attorney Christopher J. Wahl Assistant County Attorney wahl@miamidade.gov David M. Murry Assistant County Attorney dmurray@FlyMIA.com Stephen P. Clark County 111 Northwest 1 st Street, Suite 2810 Miami, Florida 33128 Telephone: (305) 375-5151 kgriffin@FlyMIA.com victor.rodriguez3@miamidade.gov <i>Counsel for Miami-Dade County</i>	HAYDEN P. O'BYRNE United States Attorney Carlos J. Raurell Assistant U.S. Attorney carlos.raurell@usdoj.gov 99 Northeast 4 th Street Miami, Florida 33132 Telephone: (305) 961-9243 melissa.Jiminson@usdoj.gov ADAM R.F. GUSTAFSON Acting Assistant Attorney General Environment and Natural Resources Division United States Department of Justice Peter M. Torstensen, Jr.

	<p>Deputy Assistant Attorney General Environment and Natural Resources Division United States Department of Justice Hayley A. Carpenter Trial Attorney hayley.carpenter@usdoj.gov Natural Resources Section Ben Franklin Station P.O. Box 7611 Washington, D.C. 20044-7611 Telephone: (202) 305-0242</p> <p><i>Counsel for Kristi Noem, in her official capacity as Secretary, United States Department of Homeland Security, and Todd Lyons, in his official capacity as Acting Director, United States Immigration and Customs Enforcement</i></p>
<p>Todd R. Friedman, Esq. todd@toddfriedmanpa.com TODD R. FRIEDMAN, P.A. 1101 Brickell Avenue Suite S-700 Miami, Florida 33131 Telephone: (786) 536-7190</p> <p><i>Counsel for The Miccosukee Tribe of Indians</i></p>	